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From: Diane Pleschner-Steele [<mailto:dplesch@earthlink.net>]

Sent: Thursday, January 06, 2005 8:06 PM

To: Ryan Broddrick

Cc: John Ugoretz; Melissa Miller-Henson; Mike Chrisman

Subject: Time Line for public review and comment

Hello again Mr. Broddrick,

Again on behalf of the California Fisheries Coalition, I'm attaching a letter expressing our concern that the process currently does not provide sufficient time for adequate review of and substantive comment on work products before the Blue Ribbon Task Force is called on to approve them. We suggest providing a notice and comment process similar to that employed by the Pacific Fishery Management Council, which would help us to participate more meaningfully.

As always, we thank you very much for your consideration of this suggestion.

Best regards,

Diane Pleschner-Steele, CFC Trustee

CALIFORNIA FISHERIES COALITION

January 5, 2005

Mr. Ryan Broddrick, Director
Department of Fish and Game
1416 Ninth Street
Sacramento, CA 95814

Alliance of Communities for
Sustainable Fisheries

California Lobster & Trap Association

California Fisheries & Seafood
Institute

California Wetfish Producers
Association

Central Coast Fisheries Conservation
Coalition

Commercial Fishermen of Santa
Barbara Inc.

Federation of Independent Seafood
Harvesters

Fishermen's Alliance of California

Golden Gate Fishermen's Association

I.S.P. Alginates Kelp Harvesters

Morro Bay Commercial Fisherman's
Organization

Moss Landing Commercial
Fishermen's Association

Port San Luis Commercial Fishermen's
Association

Recreational Fishing Alliance

Sea Urchin Harvesters Association - CA

Sea Urchin Processors Association –
CA

South Central Nearshore Trap
Organization

Southern CA Trawlers Association

Sportfishing Association of California

Ventura County Commercial
Fishermen's Association

For more information, contact
Vern Goehring, CFC Manager

Re: Time line for public review and comment

Dear Mr. Broddrick,

After reviewing the agenda for the January 10-11 meeting of the Blue Ribbon task force, we wanted to bring to your attention our concern that several of the agenda items call for task force action on revised work products, however the revisions have not been made available for public review in sufficient time for adequate review and substantive comment. In some cases, the revised documents may not be provided before the meeting.

To ensure the success of the MLPA Initiative process, it is important that stakeholders be given sufficient opportunity to review, digest, and possibly offer suggestions on, the work products that will form the basis of later policy decisions. For example, the agenda calls for presentation of a revised strategy for stakeholder participation, but the revised document is not yet available. A similar situation exists with regard to proposed task force action calling for adoption of a revised table of contents for the master plan framework. Similarly, the task force is scheduled to adopt revised criteria for considering and selecting the central coast project area; however the MLPA calls for analysis of existing MPAs as a first step. Such analysis, along with clear definitions of the specific goals and measurable objectives for an improved network of MPAs should be the first priority of both the task force and science team. Yet it seems that to date this essential piece of the process is being subsumed in the effort to design a new network on the central coast. We feel more time is needed than is currently being provided to review and comment on these important documents – now we're receiving them only a few days before meetings, if we see them at all.

We appreciate your efforts to involve stakeholders in the MLPAI process; however, we also want to point out that, according to best available science on MPAs, the most successful MPAs are those that have engaged communities fully from initial design through implementation and monitoring processes. True participation requires time and thought, as well as attendance and comments at meetings, and we hope that, notwithstanding your eagerness to implement this project expeditiously, sufficient time will be provided, as well as adequate one-on-one contact between communities and decision-makers, to enable the coastal communities and stakeholders most affected by this project to take an active role in its development. A notice and comment time line and process similar to that of the Pacific Fishery Management Council would better facilitate stakeholder participation in this initiative.

Implementing a notice and comment time line similar to that used by the PFMC, providing notice and options for review and comment well in advance of adoption, would help us all to participate more meaningfully.

Thank you very much for considering these comments and recommendations.

Trustees for the California Fisheries Coalition

Bob Fletcher

Sportfishing Association of California

Peter Halmay

Sea Urchin Harvesters - California

Jim Martin

Recreational Fishing Alliance

Diane Pleschner-Steele

CA Wetfish Producers Association

Steve Scheiblaue

Alliance of Communities for Sustainable Fisheries

cc: Mr. Mike Chrisman, Secretary for Resources